Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155-4194

MS4 SWPPP Application for Reauthorization

for the NPDES/SDS General Small Municipal Separate Storm Sewer System (MS4) Permit MNR040000 reissued with an effective date of August 1, 2013

Stormwater Pollution Prevention Program (SWPPP) Document

Doc Type: Permit Application

Instructions: This application is for authorization to discharge stormwater associated with Municipal Separate Storm Sewer Systems (MS4s) under the National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Permit Program. **No fee** is required with the submittal of this application. Please refer to "Example" for detailed instructions found on the Minnesota Pollution Control Agency (MPCA) MS4 website at http://www.pca.state.mn.us/ms4.

Submittal: This *MS4 SWPPP Application for Reauthorization* form must be submitted electronically via e-mail to the MPCA at ms4permitprogram.pca@state.mn.us from the person that is duly authorized to certify this form. All questions with an asterisk (*) are required fields. All applications will be returned if required fields are not completed.

Questions: Contact Claudia Hochstein at 651-757-2881 or claudia.hochstein@state.mn.us, Dan Miller at 651-757-2246 or daniel.miller@state.mn.us, or call toll-free at 800-657-3864.

General Contact Information (*Required fields)

MS4 Owner (with ownership or operational responsibility, or control of the MS4)

*MS4 permittee name: City of Long Lake *County: Hennepin
(city, county, municipality, government agency or other entity)

*Mailing address: 450 Virginia Avenue, PO Box 606

*City: Long Lake *State: MN *Zip code: 55356

*Phone (including area code): 952-473-6961 *E-mail: jmoeller@longlakemn.gov

MS4 General contact (with Stormwater Pollution Prevention Program [SWPPP] implementation responsibility)

*Last name: Wurzer *First name: Marv
(department head, MS4 coordinator, consultant, etc.)

*Title: Public Works Director

*Mailing address: 450 Virginia Avenue, PO Box 606

*City: Long Lake *State: MN *Zip code: 55356

*Phone (including area code): (952) 476-2855 *E-mail: mwurzer@longlakemn.gov

Preparer information (complete if SWPPP application is prepared by a party other than MS4 General contact)

Last name: Carlson First name: Jesse
(department head, MS4 coordinator, consultant, etc.)

Title: WSB & Associates

Mailing address: 477 Temperance Street

City: St. Paul State: MN Zip code: 55101

Phone (including area code): (651) 286-8464 E-mail: jcarlson@wsbeng.com

Verification

1. I seek to continue discharging stormwater associated with a small MS4 after the effective date of this Permit, and shall submit this *MS4 SWPPP Application for Reauthorization* form, in accordance with the schedule in Appendix A, Table 1, with the SWPPP document completed in accordance with the Permit (Part II.D.). ☒ Yes
2. I have read and understand the NPDES/SDS MS4 General Permit and certify that we intend to comply with all requirements of the Permit. ☒ Yes

Certification (All fields are required)

☒ Yes - *I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.*

I certify that based on my inquiry of the person, or persons, who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of civil and criminal penalties.

This certification is required by Minn. Stat. §§ 7001.0070 and 7001.0540. The authorized person with overall, MS4 legal responsibility must certify the application (principal executive officer or a ranking elected official).

By typing my name in the following box, I certify the above statements to be true and correct, to the best of my knowledge, and that this information can be used for the purpose of processing my application.

Name: Marv Wurzer
(This document has been electronically signed)

Title: Public Works Director Date (mm/dd/yyyy): 11/20/2013

Mailing address: 450 Virginia Avenue, PO Box 606

City: Long Lake State: MN Zip code: 55356

Phone (including area code): 952-476-2855 E-mail: mwurzer@longlakemn.gov

***Note:** The application will not be processed without certification.*

Stormwater Pollution Prevention Program Document

I. Partnerships: (Part II.D.1)

A. List the **regulated small MS4(s)** with which you have established a partnership in order to satisfy one or more requirements of this Permit. Indicate which Minimum Control Measure (MCM) requirements or other program components that each partnership helps to accomplish (List all that apply). Check the box below if you currently have no established partnerships with other regulated MS4s. If you have more than five partnerships, hit the tab key after the last line to generate a new row.

☐ No partnerships with regulated small MS4s

Name and description of partnership	MCM/Other permit requirements involved
Cooperative Agreement for the Long Term Operation and Maintenance of Municipal Facilities with the Minnehaha Creek Watershed District	6
Erosion and Sediment Control Review and Permitting with the Minnehaha Creek Watershed District	4
Post-construction Stormwater Management Review and Permitting with the Minnehaha Creek Watershed District	5

B. If you have additional information that you would like to communicate about your partnerships with other regulated small MS4(s), provide it in the space below, or include an attachment to the SWPPP Document, with the following file naming convention: *MS4NameHere_Partnerships.*

The City promotes educational activities presented by the Minnehaha Creek Watershed District (MCWD). MCWD has an active permitting program for erosion and sediment control and post-construction stormwater management and the City of Long Lake's ordinances reference the MCWD's erosion and sediment control requirements and post-construction stormwater requirements. The goal may be to develop a more formal partnership for implementation of their MS4 program in the following subject areas:

- Education program implementation

- Regulatory assistance

- Project funding for TMDL implementaton project

II. Description of Regulatory Mechanisms: (Part II.D.2)

Illicit discharges

A. Do you have a regulatory mechanism(s) that effectively prohibits non-stormwater discharges into your small MS4, except those non-stormwater discharges authorized under the Permit (Part III.D.3.b.)? ☐ Yes ☒ No

1. If **yes:**

   a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

   ☐ Ordinance ☐ Contract language
   ☐ Policy/Standards ☐ Permits
   ☐ Rules
   ☐ Other, explain: _____

   b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

   Citation:

   Direct link:

☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_IDDEreg.*

2. If **no:**

Describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

City Code, Section 17A, Water Management,Subd 4, Public Nuisances: This section of the City code has a policy to prevent and remedy that degradation of the quality of surface or ground waters. Based upon review of this ordinance it does not effectively prohibit non-stormwater discharges into the small MS4 to the extent required by the MS4 permit. The City will revise the existing ordinance to address the requirement of the MPCA MS4 permit. A draft of the new ordinance will be developed within six months of receiving permit coverage and the final ordinance will be adopted within 12 months of the City receiving permit coverage.

Construction site stormwater runoff control

A. Do you have a regulatory mechanism(s) that establishes requirements for erosion and sediment controls and waste controls? ☒ Yes ☐ No

1. If **yes:**

a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

☒ Ordinance ☐ Contract language
☐ Policy/Standards ☐ Permits
☐ Rules
☐ Other, explain: _____

b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

City Code: Chapter 17A, Water Management

City Code: Chapter 18, Platting Variations Minor Subdivison

City Code: Chapter 19, General Building and Performance Requirements

Direct link:

Section 17A: http://www.longlakemn.gov/vertical/Sites/%7BB1A99DAC-7328-47A4-8480-36B234C436B1%7D/uploads/%7BD2586CB9-AA79-4A90-9CF9-86819121E965%7D.PDF

Section 18: http://www.longlakemn.gov/vertical/Sites/%7BB1A99DAC-7328-47A4-8480-36B234C436B1%7D/uploads/%7BB99014BC-D045-46F2-ADD8-83C0BB3A0438%7D.PDF

Section 19: http://www.longlakemn.gov/vertical/Sites/%7BB1A99DAC-7328-47A4-8480-36B234C436B1%7D/uploads/%7BF5AA4DB7-F10B-45D0-A9F2-CA7DEBE14C6F%7D.PDF

☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_CSWreg.*

B. Is your regulatory mechanism at least as stringent as the MPCA general permit to Discharge Stormwater Associated with Construction Activity (as of the effective date of the MS4 Permit)? ☐Yes ☒ No

If you answered **yes** to the above question, proceed to C.

If you answered **no** to either of the above permit requirements listed in A. or B., describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

The City's construction site stormwater runoff control requlatory mechanisms will be updated to be at least as stringent as the MPCA CSW permit. Currently the City's Code Chapter 19, General Building and Performance Requirements states "no subdivision shall be approved that requires land disturbing activities unless erosion and sediment controls are submitted to the City as part of the Stormwater Pollution Prevention Plan (SWPPP) that meets the requirements of Rule B, as may be amended, by the Minnehaha Creek Watershed District (MCWD)". The MCWD's Rule B for erosion and sediment control is at least as stringent of the MPCA construction general permit. The City's subdivision reqirement may not applicable to all activities that distrub 1 acre or greater of soil. Within 12 months of the date permit coverage is extended revisions to the City's ordinances will be completed to to close this gap.

C. Answer **yes** or **no** to indicate whether your regulatory mechanism(s) requires owners and operators of construction activity to develop site plans that incorporate the following erosion and sediment controls and waste controls as described in the Permit (Part III.D.4.a.(1)-(8)), and as listed below:

1. Best Management Practices (BMPs) to minimize erosion. ☒ Yes ☐ No

2. BMPs to minimize the discharge of sediment and other pollutants. ☐ Yes ☒ No
3. BMPs for dewatering activities. ☐ Yes ☒ No
4. Site inspections and records of rainfall events ☐ Yes ☒ No
5. BMP maintenance ☐ Yes ☒ No
6. Management of solid and hazardous wastes on each project site. ☐ Yes ☒ No
7. Final stabilization upon the completion of construction activity, including the use of perennial vegetative cover on all exposed soils or other equivalent means. ☒ Yes ☐ No
8. Criteria for the use of temporary sediment basins. ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

C. (2): City Code, Sections 17A, 18, and 19 will be amended to include requirements to incorporate BMPs to minimize the discharge of sediment and other pollutants. The amended ordinance will be placed on the City Council's meeting agenda for approval withhin 12 months following the date permit coverage is extended.

C. (3): City Code, Sections 17A, 18, and 19 will be amended to include requirements to incorporate BMPs for dewatering activities. The amended ordinance will be placed on the City Council's meeting agenda for approval withhin 12 months following the date permit coverage is extended.

C. (4): City Code, Sections 17A, 18, and 19 will be amended to include requirements for site inspections and the recording of rainfall events. The amended ordinance will be placed on the City Council's meeting agenda for approval withhin 12 months following the date permit coverage is extended.

C. (5): City Code, Sections 17A, 18, and 19 will be amended to include requirements to incorporate requirements for doing BMP maintenance. The amended ordinance will be placed on the City Council's meeting agenda for approval withhin 12 months following the date permit coverage is extended.

C. (6): City Code Sectios 17A, 18, and 19 will be amended to include reqirements for the management of solid and hazardous wastes on each project site. The amended ordinance will be placed on the City Council's meeting agenda for approval withhin 12 months following the date permit coverage is extended.

C. (8): City Codes Sections 17A, 18, and 19 will be amended to include the use of BMP's for temporary sediment basins. The City will revise the City Ordinance using the MPCA model ECS ordinance as a guideline. The amended ordinance will be placed on the City Council's meeting agenda for approval withhin 12 months following the date permit coverage is extended.

Post-construction stormwater management

A. Do you have a regulatory mechanism(s) to address post-construction stormwater management activities?
☒ Yes ☐ No

1. If **yes:**

a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):
☒ Ordinance ☐ Contract language
☐ Policy/Standards ☐ Permits
☐ Rules
☐ Other, explain: _____

b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

City Code: Section 17A, Water Management

City Code: Section 18, Platting Variations and Minor Subdivisons

City Code: Chapter 19, General Building and Performance Requirements

Direct link:

Section 17A: http://www.longlakemn.gov/vertical/Sites/%7BB1A99DAC-7328-47A4-8480-36B234C436B1%7D/uploads/%7BD2586CB9-AA79-4A90-9CF9-86819121E965%7D.PDF

Section 18: http://www.longlakemn.gov/vertical/Sites/%7BB1A99DAC-7328-47A4-8480-

36B234C436B1%7D/uploads/%7BB99014BC-D045-46F2-ADD8-83C0BB3A0438%7D.PDF

Section 19: http://www.longlakemn.gov/vertical/Sites/%7BB1A99DAC-7328-47A4-8480-36B234C436B1%7D/uploads/%7BF5AA4DB7-F10B-45D0-A9F2-CA7DEBE14C6F%7D.PDF

☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_PostCSWreg.*

B. Answer **yes** or **no** below to indicate whether you have a regulatory mechanism(s) in place that meets the following requirements as described in the Permit (Part III.D.5.a.):

1. **Site plan review:** Requirements that owners and/or operators of construction activity submit site plans with post-construction stormwater management BMPs to the permittee for review and approval, prior to start of construction activity. ☒ Yes ☐ No

2. **Conditions for post construction stormwater management:** Requires the use of any combination of BMPs, with highest preference given to Green Infrastructure techniques and practices (e.g., infiltration, evapotranspiration, reuse/harvesting, conservation design, urban forestry, green roofs, etc.), necessary to meet the following conditions on the site of a construction activity to the Maximum Extent Practicable (MEP):

   a. For new development projects – no net increase from pre-project conditions (on an annual average basis) of: ☐ Yes ☒ No

      1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
      2) Stormwater discharges of Total Suspended Solids (TSS).
      3) Stormwater discharges of Total Phosphorus (TP).

   b. For redevelopment projects – a net reduction from pre-project conditions (on an annual average basis) of: ☐ Yes ☒ No

      1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
      2) Stormwater discharges of TSS.
      3) Stormwater discharges of TP.

3. **Stormwater management limitations and exceptions:**

   a. Limitations

      1) Prohibit the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) when the infiltration structural stormwater BMP will receive discharges from, or be constructed in areas: ☐ Yes ☒ No
         a) Where industrial facilities are not authorized to infiltrate industrial stormwater under an NPDES/SDS Industrial Stormwater Permit issued by the MPCA.
         b) Where vehicle fueling and maintenance occur.
         c) With less than three (3) feet of separation distance from the bottom of the infiltration system to the elevation of the seasonally saturated soils or the top of bedrock.
         d) Where high levels of contaminants in soil or groundwater will be mobilized by the infiltrating stormwater.

      2) Restrict the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), without higher engineering review, sufficient to provide a functioning treatment system and prevent adverse impacts to groundwater, when the infiltration device will be constructed in areas: ☐ Yes ☒ No
         a) With predominately Hydrologic Soil Group D (clay) soils.
         b) Within 1,000 feet up-gradient, or 100 feet down-gradient of active karst features.
         c) Within a Drinking Water Supply Management Area (DWSMA) as defined in Minn. R. 4720.5100, subp. 13.
         d) Where soil infiltration rates are more than 8.3 inches per hour.

      3) For linear projects where the lack of right-of-way precludes the installation of volume control practices that meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), the permittee's regulatory mechanism(s) may allow exceptions as described in the Permit (Part III.D.5.a(3)(b)). The permittee's regulatory mechanism(s) shall ensure that a reasonable attempt be made to obtain right-of-way during the project planning process. ☐ Yes ☒ No

4. **Mitigation provisions:** The permittee's regulatory mechanism(s) shall ensure that any stormwater discharges of TSS and/or TP not addressed on the site of the original construction activity are addressed through mitigation and, at a minimum, shall ensure the following requirements are met:

   a. Mitigation project areas are selected in the following order of preference: ☐ Yes ☒ No

      1) Locations that yield benefits to the same receiving water that receives runoff from the

original construction activity.

2) Locations within the same Minnesota Department of Natural Resource (DNR) catchment area as the original construction activity.
3) Locations in the next adjacent DNR catchment area up-stream
4) Locations anywhere within the permittee's jurisdiction.

b. Mitigation projects must involve the creation of new structural stormwater BMPs or the retrofit of existing structural stormwater BMPs, or the use of a properly designed regional structural stormwater BMP. ☐ Yes ☒ No

c. Routine maintenance of structural stormwater BMPs already required by this permit cannot be used to meet mitigation requirements of this part. ☐ Yes ☒ No

d. Mitigation projects shall be completed within 24 months after the start of the original construction activity. ☐ Yes ☒ No

e. The permittee shall determine, and document, who will be responsible for long-term maintenance on all mitigation projects of this part. ☐ Yes ☒ No

f. If the permittee receives payment from the owner and/or operator of a construction activity for mitigation purposes in lieu of the owner or operator of that construction activity meeting the conditions for post-construction stormwater management in Part III.D.5.a(2), the permittee shall apply any such payment received to a public stormwater project, and all projects must be in compliance with Part III.D.5.a(4)(a)-(e). ☐ Yes ☒ No

5. **Long-term maintenance of structural stormwater BMPs:** The permittee's regulatory mechanism(s) shall provide for the establishment of legal mechanisms between the permittee and owners or operators responsible for the long-term maintenance of structural stormwater BMPs not owned or operated by the permittee, that have been implemented to meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)). This only includes structural stormwater BMPs constructed after the effective date of this permit and that are directly connected to the permittee's MS4, and that are in the permittee's jurisdiction. The legal mechanism shall include provisions that, at a minimum:

a. Allow the permittee to conduct inspections of structural stormwater BMPs not owned or operated by the permittee, perform necessary maintenance, and assess costs for those structural stormwater BMPs when the permittee determines that the owner and/or operator of that structural stormwater BMP has not conducted maintenance. ☒ Yes ☐ No

b. Include conditions that are designed to preserve the permittee's right to ensure maintenance responsibility, for structural stormwater BMPs not owned or operated by the permittee, when those responsibilities are legally transferred to another party. ☒ Yes ☐ No

c. Include conditions that are designed to protect/preserve structural stormwater BMPs and site features that are implemented to comply with the Permit (Part III.D.5.a(2)). If site configurations or structural stormwater BMPs change, causing decreased structural stormwater BMP effectiveness, new or improved structural stormwater BMPs must be implemented to ensure the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) continue to be met. ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within twelve (12) months of the date permit coverage is extended, these permit requirements are met:

B.2.a.: Amend current post-construction stormwater ordinance, which includes goals for reducing post-development TSS and TP loading on an annual basis, to include volume-control requirements assocated with new development. The City will draft these amendments and be placed on the City Council's meeting agenda for approval within 12 months following the date permit coverage is extended.

B.2.b.: Amend current post-construction stormwater ordinance to include requirements to reduce volume, TSS, and TP associated with redevelopment. The City will draft these amendments and they will be placed on the City Council's meeting agenda for approval within 12 months following the date permit coverage is extended.

B.3.a.1.: The City will amend the ordinance to include requirements for prohibiting the use of infiltration techniques as described in the permit (PartIII.D.5.a(3)(a).1).This will occur on the same schedule as B.2.a.

B.3.a.2: The City will amend the ordinance to include restricting the use of infiltration techniques for post-construction stormwater management as described in the Permit (PartIII.D.5.a(3)(a).2). This will occur on the same schedule as in B.2.a.

B.3.a.3: The City will amend the ordinance to include the exceptions for linear projects as described in the Permit (PartIII.D.5.a(3)(b)). This will occur in the schedule as in B.2.b.

B.4.a.: The City will amend the ordinance to include order of preference for selecting mitigation project areas as described in the Permit (PartIII.D.5.a(4)(a)). This will occur on the same schedule as B.2.b.

B.4.b.: The City will amend the ordinance to include requirements for the creation of mitigation projects as described in the Permit (PartIII.D.5.a(4)(b)). This will occur on the same schedule as B.2.b.

B.4.c.: The City will amend the ordinance to include the restrictions from using routine maintenance of structural BMPs to meet the requirements for mitigation projects as described in the Permit (PartIII.D.5.a(4)(c)). This will occur on the same schedule as B.2.b.

B.4.d.: The City will amend the ordinance to include the requirement to complete mitigation projects within 24 months

after the start of the original construction activity as described in the Permit (PartIII.D.5.a(4)(d)). This will occur on the same schedule as B.2.b.
B.4.e.: The City will amend the ordinance to to include the requirement to determine and document who will be responsible for the long-term maintenance on mitigation projects as described in the Permit (PartIII.D.5.a(4)(e)). This will occur on the same schedule as B.2.b.
B.4.f.: The City will amend the ordinance to mandate that money received from an owner/operator of construction activity, in lieu of meeting the conditions for post-construction stormwater management, shall be used for a public stormwater project as described in the Permit (PartIII.D.5.a(4)(f)). This will occur on the same schedule as B.2.b.
B.5.c.: The City will amend the ordinance to include conditions to address BMP modification in the future as described in the Permit (PartIII.D.5.a(5)(c)). This will occur on the same schedule as B.2.b.

III. Enforcement Response Procedures (ERPs): (Part II.D.3)

A. Do you have existing ERPs that satisfy the requirements of the Permit (Part III.B.)? ☐ Yes ☒ No

1. If **yes**, attach them to this form as an electronic document, with the following file naming convention: *MS4NameHere_ERPs.*
2. If **no**, describe the tasks and corresponding schedules that will be taken to assure that, with twelve (12) months of the date permit coverage is extended, these permit requirements are met:

   The City will develop draft ERPs within 6 months of reciveing permit coverage. The draft ERPs will include requirements for site inspections, criteria for elevating enforcement, and enforcement tools.The ERPs will be developed for MCMs 3, 4, and 5. Enforcement mechanisms considered may include:

   - Notice of volations

   - Stop work orders

   - Securities in the form of a performance bond, letter of credit, or cash deposit

   - Misdemeanor

   - Partnerships with the watershed for enforcement of their maintenance aggreement for post-construction stormwater BMPs with private developments.

   The draft ERPs will be incorporated in the City Code or policy document within 12 months of receiving permit coverage.

B. Describe your ERPs:

City Code: Section 30, Violation, Enforcement, Effect and Validity

The City Code includes the following enforcement mechanisms:

- Written Orders

- Revocation of Permit

- Cease and Desist Use of Premises

- Misdemeanors

IV. Storm Sewer System Map and Inventory: (Part II.D.4.)

A. Describe how you manage your storm sewer system map and inventory:

The GIS storm sewer system map is updated as the City inspects their system and completes public improvement projects.The City uses their consultant to update their GIS Information.

B. Answer **yes** or **no** to indicate whether your storm sewer system map addresses the following requirements from the Permit (Part III.C.1.a-d), as listed below:

1. The permittee's entire small MS4 as a goal, but at a minimum, all pipes 12 inches or greater in diameter, including stormwater flow direction in those pipes. ☒ Yes ☐ No
2. Outfalls, including a unique identification (ID) number assigned by the permittee, and an associated geographic coordinate. ☐ Yes ☒ No
3. Structural stormwater BMPs that are part of the permittee's small MS4. ☒ Yes ☐ No
4. All receiving waters. ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

B.2.: The City will amend the storm sewer system map to include the identification of outfalls. This will occur within 12 months following the date permit coverage is extended.

B.4.: The City will amend the storm sewer system map to include the identification of all receiving waters. This will occur within 12 months following the date permit coverage is extended.

C. Answer **yes** or **no** to indicate whether you have completed the requirements of 2009 Minnesota Session Law, Ch. 172. Sec. 28: with the following inventories, according to the specifications of the Permit (Part III.C.2.a.-b.), including:

1. All ponds within the permittee's jurisdiction that are constructed and operated for purposes of water quality treatment, stormwater detention, and flood control, and that are used for the collection of stormwater via constructed conveyances. ☒ Yes ☐ No
2. All wetlands and lakes, within the permittee's jurisdiction, that collect stormwater via constructed conveyances. ☐ Yes ☒ No

D. Answer **yes** or **no** to indicate whether you have completed the following information for each feature inventoried.

1. A unique identification (ID) number assigned by the permittee. ☒ Yes ☐ No
2. A geographic coordinate. ☐ Yes ☒ No
3. Type of feature (e.g., pond, wetland, or lake). This may be determined by using best professional judgment. ☐ Yes ☒ No

If you have answered **yes** to all above requirements, and you have already submitted the Pond Inventory Form to the MPCA, then you do not need to resubmit the inventory form below.

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

C.2: The City has a storm sewer system map that identifies waterbodies within the City. This map will be updated to classify between lakes, wetlands, and ponds. This map will be updated within 12 months following the date permit coverage is extended.

D.2:. The City will update the storm sewer map to include a geogrpahic coordinate for each stormwater feature inventoried as described in the Permit (Part III.C.2.b). This map will be updated within 12 months following the date permit coverage is extended.

D.3.: The City will update the storm sewer map to identify the feature type for each stormwater feature inventoried as described in the Permit (Part III.C.2.b). This map will be updated within 12 months following the date permit coverage is extended.

E. Answer **yes** or **no** to indicate if you are attaching your pond, wetland and lake inventory to the MPCA on the form provided on the MPCA website at: http://www.pca.state.mn.us/ms4 , according to the specifications of Permit (Part III.C.2.b.(1)-(3)). Attach with the following file naming convention: *MS4NameHere_inventory*. ☐ Yes ☒ No

If you answered **no,** the inventory form must be submitted to the MPCA MS4 Permit Program within 12 months of the date permit coverage is extended.

V. Minimum Control Measures (MCMs) (Part II.D.5)

A. MCM1: Public education and outreach

1. The Permit requires that, within 12 months of the date permit coverage is extended, existing permittees revise their education and outreach program that focuses on illicit discharge recognition and reporting, as well as other specifically selected stormwater-related issue(s) of high priority to the permittee during this permit term. Describe your **current** educational program, including **any high-priority topics included**:

   The City of Long Lake is comprised of a large percentage of single family residential, industrial, and commercial development. The other land uses include multi-family residential, and parks. The priority of the eduction program has been mainly centered on issues associated with single family residential. The City sends educational information using the following:

   - Quarterly Newsletter

   - Website

   - Brochures

2. List the categories of BMPs that address your public education and outreach program, including the distribution of

educational materials and a program implementation plan. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the U.S. Environmental Protection Agency's (EPA) *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	**Measurable goals and timeframes**
Distribute Educational Materials	*The City will publish a series of articles in the Long Lake newsletter that is mailed to City residents and made available at City offices. The City will also continue to produce and maintain a website that will communicate water resource activities and projects at http://www.ci.Long Lake.mn.us.* *The City will obtain and/or develop a series of informational handouts that will be made available at City facilities. These handouts (flyers) will also be distributed at times in direct mailings to reach businesses and residents regarding general storm water issues. For example, the City currently has flyers related to rainwater gardens that can be distributed through direct mailing as street reconstruction projects are planned. Additionally articles will be published for selected MCMs in the Long Lake newsletter.* *This BMP will be implemented into the new permit term and incorporated into the BMP with the title "Education Activity Implementation Plan".*
Education Program: Pollution Prevention/Good Housekeeping for Municipal Operations	*The program will make known the importance of storm water issues and how people and city staff can make an impact on a larger scale. This information will also let residents know what the City is doing on a regular basis to actively improve water quality throughout the City. This includes posting article(s) on the City website and publishing article(s) in the Long Lake Bulletin relating to Minimum Control Measure #5. In addition an annual training event on municipal operations will be conducted and the information will be made available to staff.* *This BMP will be implemented into the new permit term and incorporated into the BMP under MCM 6 titled "Training".*
Coordination of Education Program	*The City will work with Hennepin County, the WMO to distribute general information on non-point source pollution, water resource impacts and needs for and benefits of reduction. The City also currently has efforts ongoing with these agencies to promote and install a range of storm water practices in suitable areas. The most efficient method of coordinating these programs is by maintaining links to related programs on the various websites including the Hennepin County web pages. Web links and access to material from both the MPCA and WMO will also be provided.* *This BMP will be implemented into the new permit term.*
Environmental Utility Fund	*The City has an Environmental Enterprise Fund (e.g., storm water utility) that is used to help fund storm water related projects and maintenance activities. While not a required BMP under the NPDES MS4 permit, the City will maintain this. An annual review of the rate structure will be accomplished in accordance with the annual financial audit process. Changes to rates will be made as needed to support the program needs.* *This BMP will be implemented into the new permit term.*

BMP categories to be implemented	**Measurable goals and timeframes**
Education Activity Implementation Plan	*Complete outline of education activity implementation program and implementation schedule for the upcoming permit year. This will include a process for prioritizing education into three areas at a minimum and may be based on:*

	• *Single family residential* • *Future TMDLs* • *Industrial land uses* *This will be completed annually by June 30th. The information will be distributed using the following techniques:* *- Quarterly Newsletter* *- Long Lake City List Serve* *- Website* *- Brochures/handouts*
Education Kiosks	*Incorporate educational kiosks into City parks or recreational facilities where water quality improvement projects are completed.*
Program Evaluation	*During yearly SWPPP review, consider which materials are most effective for our program and audiences, Use this information to determine printing numbers for future education materials.* *Consider information from citizen feedback related to all aspects of our SWPPP to determine education needs on a yearly basis.*

3. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

   Marv Wurzer, Public Works Director

B. MCM2: Public participation and involvement

1. The Permit (Part III.D.2.a.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement a public participation/involvement program to solicit public input on the SWPPP. Describe your current program:

   An opportunity to hear comments on the SWPPP is provided each year during an annual meeting held in combination with a City Council Meeting.

2. List the categories of BMPs that address your public participation/involvement program, including solicitation and documentation of public input on the SWPPP. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

   Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	**Measurable goals and timeframes**
Comply with Public Notice Requirements	*The City will provide at least 30 days' notice to residents through the local newspaper relating to the date, time and details of the annual public meeting. The meeting will be held in approximately May of each year to present progress to date on the City's SWPPP for the past year and required activities for the following year. The City will follow applicable public notice requirements and solicit public opinion about the adequacy of the SWPPP. The City will consider both written and oral public comments. The format and timing of the meeting will be specified to ensure full and fair consideration of all views.* *This BMP will be implemented into the new permit term.*
Solicit Public Input and opinion on the Adequacy of the SWPPP	*The City will hold an annual public meeting at a Council meeting in approximately May of each year to present progress to date on the City's SWPPP for the past year and required activities for the following year. The City will follow applicable public notice requirements and solicit public opinion about the adequacy of the SWPPP. The City will consider both written and oral public comments. Long Lake will also broadcast the annual informational meeting on community cable programming. A draft annual report will be available at the public meeting.*

	This BMP will be revised to require one opportunity annually for the public to provide input on the adequacy of the SWPPP vs. only providing for this opportunity to occurring during a Council meeting.
Consider Public Input	*The City will hold an annual public meeting at a Council meeting in approximately May of each year to present progress to date on the City's SWPPP for the past year and required activities for the following year. The City will follow applicable public notice requirements and solicit public opinion about the adequacy of the SWPPP. The City will consider both written and oral public comments. Long Lake will also broadcast the annual informational meeting on community cable programming. Adjustments to the SWPPP will be analyzed and any comments will be documented and summarized. Any significant changes identified by the input to the annual report and SWPP revisions will be incorporated.* *This BMP will be revised to require one opportunity annually for the public to provide input on the adequacy of the SWPPP vs. only providing for this opportunity to occurring during a Council meeting. Revisions to this BMP will describe the process for receiving and documenting comments received on the SWPPP.*

BMP categories to be implemented	**Measurable goals and timeframes**
Coordination of Outreach Activities	*The City will sponsor and/or provide notice regarding events that are occurring within the City or surrounding area that provide educational information regarding such topics as raingarden installation/maintenance, buckthorn removal, shoreline stabilization, and proper deicing procedures/practices.*
Online Availability of Stormwater Pollution Prevention Program Document	*Provide an electronic document of Stormwater Pollution Prevention Program document online to allow easier access to these documents..*

3. Do you have a process for receiving and documenting citizen input? ☐ Yes ☒ No

   If you answered **no** to the above permit requirement, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

   B.3. The City will develop written procedures for receiving, documenting and storing citizen input as described in the permit (Part III.C.2.b). Procedures will be in place within 12 months following the date permit coverage is extended.

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

   Marv Wurzer, Public Works Director

C. MCM 3: Illicit discharge detection and elimination

1. The Permit (Part III.D.3.) requires that, within 12 months of the date permit coverage is extended, existing permittees revise their current program as necessary, and continue to implement and enforce a program to detect and eliminate illicit discharges into the small MS4. Describe your current program:

   The City has an ordinance that prohibits the degradation of the quality of surface or ground waters as well as pubic and private land resources. The City can enforce this language in the event of a an illicit discharge; however revisions to meet the new MS4 requirements will be necessary. City Staff and public works employees are trained to look for any signs of an illicit discharge while on the job.

2. Does your Illicit Discharge Detection and Elimination Program meet the following requirements, as found in the Permit (Part III.D.3.c.-g.)?

   a. Incorporation of illicit discharge detection into all inspection and maintenance activities conducted under the Permit (Part III.D.6.e.-f.)Where feasible, illicit discharge inspections shall be conducted during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation). ☒ Yes ☐ No

   b. Detecting and tracking the source of illicit discharges using visual inspections. The permittee may also include use of mobile cameras, collecting and analyzing water samples, and/or other detailed procedures that may be effective investigative tools. ☒ Yes ☐ No

   c. Training of all field staff, in accordance with the requirements of the Permit (Part III.D.6.g.(2)), in illicit discharge recognition (including conditions which could cause illicit discharges), and reporting illicit discharges for further investigation. ☐ Yes ☒ No

d. Identification of priority areas likely to have illicit discharges, including at a minimum, evaluating land use associated with business/industrial activities, areas where illicit discharges have been identified in the past, and areas with storage of large quantities of significant materials that could result in an illicit discharge. ☐ Yes ☒ No

e. Procedures for the timely response to known, suspected, and reported illicit discharges. ☐ Yes ☒ No

f. Procedures for investigating, locating, and eliminating the source of illicit discharges. ☐ Yes ☒ No

g. Procedures for responding to spills, including emergency response procedures to prevent spills from entering the small MS4. The procedures shall also include the immediate notification of the Minnesota Department of Public Safety Duty Officer, if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. § 115.061. ☐ Yes ☒ No

h. When the source of the illicit discharge is found, the permittee shall use the ERPs required by the Permit (Part III.B.) to eliminate the illicit discharge and require any needed corrective action(s). ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

C.2.c.: The City will incorporate procedures into the IDDE program for training of all field staff to be knowledgeable about identifying illicit discharges and to understand what do in the event that an illicit discharge is discovered described in the permit (Part III.D.3.c). Procedures will be in place within 12 months following the date permit coverage is extended.

C.2.d.& e., The City will incorporate procedures into the IDDE program for identifying priority areas and for a timely response to known, suspected, and reported illicit discharges as and the development of ERPs described in the permit (Part III.D.3.c.& d.). Procedures will be in place within 12 months following the date permit coverage is extended.

C.2.f.: The City will incorporate procedures for investigating, locating, and eliminating sources of illicit discharges as described in the permit (Part III.D.3.c.f). Procedures will be in place within 12 months following the date permit coverage is extended.

C.2.g.: The City will incorporate procedures for responding to spills, including emergency response procedures from entering the small MS4 as described in the permit (Part III.D.3.c.g). Procedures will be in place within 12 months following the date permit coverage is extended.

C.2.h.: The City will incorporate procedures for implementing the use of ERPS to eliminate illicit discharges as described in the permit (Part III.D.3.c.h). Procedures will be in place within 12 months following the date permit coverage is extended.

3. List the categories of BMPs that address your illicit discharge, detection and elimination program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

   Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf).

   If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Storm Sewer System Map	*The City has prepared a draft map that shows the location of portions of the City storm sewer system, treatment facility components and receiving water bodies. The map currently helps facilitate management of the overall illicit discharge detection and elimination program and the BMP maintenance program. The map is currently drafted and is updated annually. An electronic (GIS/CAD-based) storm system infrastructure map of the MS4 will be completed in subsequent permit years to help coordinate management activities to remove illicit connections and track storm system inspections and maintenance. The map will identify: 1) ponds, streams, lakes and wetlands that are part of the City's storm system; 2) structural pollution control devices (grit chambers, separators, etc.); 3) all pipes and conveyances as a goal, but at a minimum, those pipes that are 24 inches in diameter and over; and 4) Out falls to receiving waters and other MS4s, structures that discharge directly to groundwater, overland discharge points and all other points that are outlets, but not diffuse flow areas. The existing data relating items 1-4 will be compiled. A draft GIS/CAD based map will be created and the MS4 map completed. The new BMPs and storm system created by the new and redevelopment projects will be incorporated upon the completion of the map.*

	This BMP will be implemented into the permit term and be updated to reflect the revised mapping requirements identified in the new permit.
Regulatory Control Program	*The City will adopt a regulatory mechanism to prohibit non-storm water discharges into the storm sewer system* *State law covers the use of commercial fertilizer and lawn fertilizer applications. The ordinances and codes will provide authority to inspect systems and facilities, prevent illicit connections and discharges, and allow for punitive measures.* *The city will review ordinances to determine if they are adequately meeting the illicit discharge requirements. They will also initiate formal updates to address illicit discharges in City code. Updates to the illicit discharge ordinance will be completed and the ordinance passed (due June 30, 2008). Updates will be completed as needed through a formal ordinance review and modification process.* *The City has language in City Code Section 17A regarding the degradation of the quality of surface or ground waters as well as pubic and private land resources.This ordinance will be reviewed as a part of this update process to determine what updates will be necessary.*
Illicit Discharge Detection and Elimination Plan	*The City has explored opportunities to expand existing inspection programs to address illicit connections and illegal dumping detection and elimination. The City has coordinated current activities with the complaint response program and related inspection and monitoring activities. This will be one of the methods by which the City monitors for illicit discharges into and from their system.* *A range of potentially polluting activities occurs throughout the City (e.g., construction projects, hazardous materials handling, used oil and pesticide disposal, etc.) that can be identified and better addressed through this program. The storm system outfalls in the City inspecting these outfalls will be one step in tracking down illicit discharges or other potential water quality hazards that may impact the MS4 system.* *The City will respond to complaints or information relating to potential illicit discharges and illegal dumping. An inspection program of the City storm system and development projects will be implemented. The City will also evaluate the annual monitoring data (if available) that may be available from the local watershed districts.* *This BMP will be revised to include the prioritization of areas likely to have illicit discharges. Once revised this BMP will be implemented into the new permit term.*
Public and Employee Illicit Discharge Information Program	*Representatives from city staff participate in the Public Works Forum. The group meets to discuss storm water related issues, one of which is the need for training for city personnel and issues relating to illicit discharges. Staff from Public Works and Engineering Departments will attend the PWF training sessions.* *Internal spill prevention and control training is held annually and includes personnel from street maintenance, sewers, and vehicle maintenance were required to attend. Illicit discharge and response is also covered in the internal training session.* *The City will distribute information on illicit discharges and conduct annual staff training.* *This BMP will be implemented into the new permit term.*
Identification of Non Stormwater Discharges & Flows	*The City has reviewed specific non-storm water discharges or flows (i.e., illicit discharges) and has determined that none are known to be significant contributors of pollutants to our system*

	at this time. The City will review non-storm water discharge list annually to evaluate significance of each potential source. *This list will be reevaluated and continued into the new permit term.*

BMP categories to be implemented	**Measurable goals and timeframes**
IDDE Program Updates	*Update written procedures for illicit discharge inspections, investigations, and response actions. Develop a process to document information as described in the Permit (Part III.3.h) within 12 months following the date permit coverage is extended.* *This BMP will be incorporated with the IDDE Plan.*
Illicit Discharge Inspections	*Illicit discharge inspections will be completed during the inspections of 20% of their MS4 outfalls, annual inspections of locations identified as high-priority outfalls, and staff will be trained to identify illicit discharges as they complete their daily job duties.*
Illicit Discharge Investigation	*As needed hire a contractor to televise a section of our sewer system, collect grab samples or perform other effective testing procedures to find illicit connection in the system.*

4. Do you have procedures for record-keeping within your Illicit Discharge Detection and Elimination (IDDE) program as specified within the Permit (Part III.D.3.h.)? ☐ Yes ☒ No

   If you answered **no**, indicate how you will develop procedures for record-keeping of your Illicit Discharge, Detection and Elimination Program, within 12 months of the date permit coverage is extended:

   C.4., The City will develop written procedures for receiving, documenting and storing citizen input as descriped in the permit (Part III.D.3.h). Procedueres will be in place within 12 months following the date permit coverage is extended.

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

   Marv Wurzer, Public Works Director

D. MCM 4: Construction site stormwater runoff control

1. The Permit (Part III.D.4) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a construction site stormwater runoff control program. Describe your current program:

   The City requires review of construction site erosion and sediment control (ESC) plans before projects begin, and work with contractors to ensure appropriate and correct use of erosion and sediment control BMPs on sites. The building inspections department is primarily responsible for checking compliance with construction site ESC plans.

2. Does your program address the following BMPs for construction stormwater erosion and sediment control as required in the Permit (Part III.D.4.b.):
   a. Have you established written procedures for site plan reviews that you conduct prior to the start of construction activity? ☒ Yes ☐ No
   b. Does the site plan review procedure include notification to owners and operators proposing construction activity that they need to apply for and obtain coverage under the MPCA's general permit to *Discharge Stormwater Associated with Construction Activity No. MN R100001*? ☒ Yes ☐ No
   c. Does your program include written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public to the permittee? ☐ Yes ☒ No
   d. Have you included written procedures for the following aspects of site inspections to determine compliance with your regulatory mechanism(s):
      1) Does your program include procedures for identifying priority sites for inspection? ☐ Yes ☒ No
      2) Does your program identify a frequency at which you will conduct construction site inspections? ☐ Yes ☒ No
      3) Does your program identify the names of individual(s) or position titles of those responsible for conducting construction site inspections? ☐ Yes ☒ No
      4) Does your program include a checklist or other written means to document construction site inspections when determining compliance? ☐ Yes ☒ No
   e. Does your program document and retain construction project name, location, total acreage to be ☒ Yes ☐ No

disturbed, and owner/operator information?

f. Does your program document stormwater-related comments and/or supporting information used to determine project approval or denial? ☒ Yes ☐ No

g. Does your program retain construction site inspection checklists or other written materials used to document site inspections? ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

D.2.c.: The City will develop written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public as described in the Permit (Part III.D.4.c). Procedures will be in place within 12 months following the date permit coverage is extended.

D.2.d.: The City will develop written procedures for conducting site ESC inspections as described in the Permit (Part III.D.4.d). Procedures will be in place within 12 months following the date permit coverage is extended.

D.2.g.: The City will develop written procedures for retaining documents of site ESC inspections as described in the Permit (Part III.D.4.d). Procedures will be in place within 12 months following the date permit coverage is extended.

3. List the categories of BMPs that address your construction site stormwater runoff control program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

   Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Ordinance or other Regulatory Mechanism	*The City will create an ordinance to address ESC requirements, enforcement, escrows etc.* *The City will create an erosion and sediment control ordinance sections to maintain adequate controls and complete updates, as needed, through formal ordinance review and modification process.* *This BMP will be implemented into the new permit term and the existing ordinances will be revised to reflect the requirements of the new MPCA Construction General Permit.*
Construction Site Implementation of Erosion and Sediment Control BMPs	*The City will establish a program and process for ESC permits and inspections along with a methodology of enforcement.* *The City will establish an ESC program which includes conducting plan reviews of proposed erosion control practices and conducting inspections of construction sites.* *This BMP will be implemented into the new permit term.*
Waste Controls for Construction Site Operators	*The City has a current policy that addresses construction site waste controls. The policy is related to building code enforcement but also gives the City the authority to address issues relating to potential water quality hazards of construction site waste management. The City will address this issue in its ESC or Storm Water Ordinance (as a section in the Ordinance).* *The City will create an ESC ordinance with a section for Waste controls. This will include recording the number of non-compliant sites (based on inspections) and recording the number of sites where City clean-up is needed.* *This BMP will be implemented into the new permit term with provisions for waste control incorporated into ordinance revisions.*
Procedure for Site Plan Review	*The City will develop and document a procedure for Site Plan Review for all land disturbing activities for compliance with the erosion and sediment control ordinance prior to issuing a building permit. This will include reviewing the development plans for sites which include land disturbing activities. The number of sites/projects reviewed annually will be recorded. The number and type of storm water management BMPs proposed will be tracked.*

	This BMP will be implemented into the new permit term.
Establishment of Procedures for the Receipt and Consideration of Reports of Stormwater Noncompliance	*The City will use their existing system of responding to calls to the public works department on storm water related concerns. The program phone number and process will be noticed in the City Newsletter and on the webpage. Residents of the City will be able to use the call line to report illicit discharges, report construction site erosion or sedimentation concerns and provide comments on the City's SWPPP.* *The City will maintain a dedicated storm water call number on their website and will record the number of calls and the nature of the complaint/call. Additionally the number of staff inspections resulting from the call line will be recorded along with the follow-up actions.* *This BMP will be implemented into the new permit term. The City has a tab on the home page of their website identified as "Lake & Water Quality Information". A contact number for issuing complaints will be provided on this section of their website.*
Establishment of Procedures for Site Inspections and Enforcement	*The City currently inspects all construction sites to review compliance with code and permit requirements. Developers/applicants apply to the City for a building permit and City staff complete final project reviews and site inspections during construction. The City will develop a procedure for site inspections for ESC violations. The number of sites inspected annually, the number of non-compliant sites, and the number of sites where City clean-up is needed will all be recorded.* *This BMP will be implemented into the new permit term and the two BMPs identified below will be incorporated into this BMP within 12 months following the data permit coverage is extended.*

BMP categories to be implemented	**Measurable goals and timeframes**
Prioritize Inspections	*The City will develop a process to determine the frequency for inspecting high priority inspection sites (e.g., near sensitive receiving waters, projects larger than 5 acres, etc.).*
Documentation Procedures	*Develop written procedures to track and archive all plan review and inspection documents within 12 months following the date permit coverage is extended.*

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

   Marv Wurzer, Public Works Director

E. MCM 5: Post-construction stormwater management

1. The Permit (Part III.D.5.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a post-construction stormwater management program. Describe your current program:

   The City has a post-construction sotrmwater management ordinace that requires the utilization of BMPs for stormwater runoff from new and redevelopment projects, as well as to ensure the maintenance and operation of the stormwater BMPs.

2. Have you established written procedures for site plan reviews that you will conduct prior to the start of construction activity? ☒ Yes ☐ No

3. Answer **yes** or **no** to indicate whether you have the following listed procedures for documentation of post-construction stormwater management according to the specifications of Permit (Part III.D.5.c.):

   a. Any supporting documentation that you use to determine compliance with the Permit (Part III.D.5.a), including the project name, location, owner and operator of the construction activity, any checklists used for conducting site plan reviews, and any calculations used to determine compliance? ☐ Yes ☒ No

b. All supporting documentation associated with mitigation projects that you authorize? ☐ Yes ☒ No

c. Payments received and used in accordance with Permit (Part III.D.5.a.(4)(f))? ☐ Yes ☒ No

d. All legal mechanisms drafted in accordance with the Permit (Part III.D.5.a.(5)), including date(s) of the agreement(s) and names of all responsible parties involved? ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the steps that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

E.3., The City will develop written procedures for documention of post-construciton stomwater management as described in the Permit (Part III.D.5.c.). Procedures will be in place within 12 months following the date permit coverage is extended.

4. List the categories of BMPs that address your post-construction stormwater management program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

   Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Development and Implementation of Structural and/or Non-structural BMPs	*The City currently has several ordinances and standards that must be followed to address post construction runoff controls at sites where land disturbing activities are occurring. The City' current controls include: a "NURP standards" that specifies required design standards for storm water treatment ponds. The City will identify all structural and non-structural BMPs on the system map and create an inspection process. The City will record the number and type of structural and non-structural BMPs installed annually on the MS4's SW map. A database of all identified BMPs will be created along with an inspection process for the BMPs.* *This BMP will be implemented into the new permit term along with revising it to include the requirement to maintain runoff volumes, TSS, and TP for new development and reduce the runoff volume, TSS, and TP for redevelopment.*
Regulatory Mechanism to Address Post Construction Runoff from New Development and Redevelopment	*The City will create a "Storm Water Ordinance" that will address post construction runoff, proper BMPs and BMP maintenance by June 30, 2008.* *The City has existing ordinances in-place that applies to applications for subdivision that require post-construction stormwater management. These ordinances will be revised to comply with the requirement for post-construction stormwater management for development and redevelopment. These revisions will occur within 12 months of permit coverage being extended.*
Long-term Operation and Maintenance of BMPs	*Long Lake will continue to implement the current program to require maintenance of new storm water ponds and other water quality BMPs within the City that are not owned or operated by the City. The City has a template maintenance agreement that can be used to establish specific maintenance requirements and schedules for a variety of BMPs. The City will look for opportunities to improve maintenance of private systems that were installed prior to establishment of the maintenance agreement program* *The City will require maintenance agreements on new private BMPs during the development approval process. The number of new private systems where maintenance agreements have been completed will be recorded and tracked. A private BMP maintenance agreement tracking system will be maintained.*

	This BMP will be implemented into the new permit term.

BMP categories to be implemented	Measurable goals and timeframes
Develop Written Procedures for Site Plan Review	*Develop site plan review procedures that must be completed prior to the start of construction activity within 12 months of extension of permit coverage.*
Document Pertinent Project Information	*Maintain all related documents pertaining to each new or redevelopment project in more user-friendly filing system for better records management. Implement within 12 months.*

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

   Marv Wurzer, Public Works Director

F. MCM 6: Pollution prevention/good housekeeping for municipal operations

1. The Permit (Part III.D.6.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement an operations and maintenance program that prevents or reduces the discharge of pollutants from the permittee owned/operated facilities and operations to the small MS4. Describe your current program:

   The City currently inspects its structural pollution control devices on an annual basis and inspects all of its outfalls, sediment basins and ponds every 5 years. The City inspects stockpiles, storage and material handling areas at the maintenance yard for potential discharges and maintenance of BMPs essentially on a daily basis, but will formally inspect this site quarterly and document the results of the inspection. The City sweeps the streets in the spring and once in the fall after leaf drop, if weather is permitting.

2. Do you have a facilities inventory as outlined in the Permit (Part III.D.6.a.)? ☐ Yes ☒ No

3. If you answered **no** to the above permit requirement in question 2, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

   F.2.: The City will inventory, evaluate pollutants, and develop a map of facilities within the City of Long. Only facilities that have pollutants of concern will be identified and upon initial investigation it appears the only facility where this would occur would be the public works facility. This will be completed within 12 months of the date permit coverage is extened.

4. List the categories of BMPs that address your pollution prevention/good housekeeping for municipal operations program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

   Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. For an explanation of measurable goals, refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (http://www.epa.gov/npdes/pubs/measurablegoals.pdf).

   If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Municipal Operations and Maintenance Program	*Representatives from city staff participate in the Public Works Forum (PWF).The group meets monthly to discuss storm water related issues, one of which is the need for training for city personnel. Spill Prevention and Control training is held annually, generally in about in February of each year. Public works personnel from street maintenance, sewers, and vehicle maintenance are required to attend. The park maintenance crew also attends.* *The goal of the internal staff training event is to prevent or reduce the discharge of pollutants in to the City storm water system and City water bodies. Training will address activities and best management practices to be followed during park and open space maintenance, fleet and building maintenance, new construction and storm system maintenance.* *A staff training event will be conducted at least annually to discuss the topics relating to water resources programs. The number of staff attending the annual training event and the topics covered will be recorded. Meetings will be conducted as*

	needed on storm water related operational priorities and activities. *This BMP will be implemented into the new permit term.*
Street Sweeping	*The City will continue the current street sweeping program for vehicle safety, pedestrian safety, and water quality and environmental reasons. Street sweeping will be done as weather permits (late March to early April) through the first snowfall. The City also prioritizes sweeping to target key areas of the City.* *The City will sweep at least once in the spring of each year (additional fall sweeping as weather permits). Sweep priority/targeted areas will be identified as needed throughout the year (summer and/or winter). The number of miles and the amount (volume or weight) of material collected will be estimated annually.* *This BMP will be implemented into the new permit term.*
Annual Inspection of All Structural Pollution Control Devices	*The City currently operates a program of cleaning structural BMPs including catch basins, storm water ponds and system outfalls. City staff inspects system components to look for sediment and debris buildup and proper functioning of the system and illicit discharges. The City is developing a more detailed database for the storm system that will be used to better track inspection activities and initiate maintenance work orders. The City will continue this program and look for opportunities to improve the tracking of inspection results and program efficiency. The inspection program will be coordinated with the BMP and Outfall mapping updates.* *The City will inspect 100% of the pollution control devices such as trap manholes, grit chambers, sumps, floatable skimmers, separators and other small settling or filtering devices each year. Any follow-up actions needed will be recorded, tracked, and assigned a priority level and a timeline for addressing the problem. The inspection date, weather conditions and results for each component inspected will be recorded along with the dates of any major maintenance activities.* *This BMP will be implemented into the new permit term.*
Inspection of a Minimum of 20 percent of the MS4 Outfalls, Sediment Basins and Ponds Each Year on a Rotating Basis	*The City currently operates a program of cleaning structural BMPs including catch basins, storm water ponds and system outfalls. City staff inspects system components to look for sediment and debris buildup and proper functioning of the system and illicit discharges. The City is developing a more detailed database for the storm system that will be used to better track inspection activities and initiate maintenance work orders. The City will continue this program and look for opportunities to improve the tracking of inspection results and program efficiency. The inspection program will be coordinated with the BMP and Outfall mapping updates.* *The City will inspect at least 20% of system outfalls, sediment basins and ponds each year. Any follow-up actions needed will be recorded, tracked, and assigned a priority level and a timeline for addressing the problem. The inspection date, weather conditions and results for each component inspected will be recorded along with the dates of any major maintenance activities.* *This will be implemented into the new permit term.*
Inspection of All Exposed Stockpile, Storage and Material Handling Areas	*The City currently operates material stockpiles and handling areas at several locations within the City. The City inspects these areas at least annually and conducts maintenance as needed as part of the overall storm system maintenance*

	program. The City will continue this program and look for opportunities to improve the tracking of inspection results and program efficiency. The inspection program will be coordinated with the BMP and outfall mapping updates. *The City will inspect the material stockpile and handling areas each year. Any follow-up actions needed will be recorded, tracked, and assigned a priority level and a timeline for addressing the problem. The inspection date, weather conditions and results for each component inspected will be recorded along with the dates of any major maintenance activities.* *This BMP will be revised to require quarterly inspections of exposed stockpile, storage, and material handling areas and be implemented into the new permit term. The revisions to this BMP will be completed within 12 months of receiving permit coverage.*
Inspection Follow-up Including the Determination of Whether Repair, Replacement, or Maintenance Measures are Necessary and the Implementation of the Corrective Measures	*The City will continue to update the inventory of structural runoff controls and continue current BMP maintenance and pond cleanout programs and record data in the developing GIS/CAD database system to integrate the location of these controls with schedules for regular inspection and maintenance. The program will result in timely maintenance of the City's storm system components.* *The City has created forms that are used for creating follow-up work orders for major and minor maintenance activities.* *The City will inspect and maintain system components according to priority system established by the City. The number of system components maintained, the general condition of the system, and the major maintenance completed on the system will be tracked on an ongoing basis.*
Record Reporting and Retention of All Inspections and Responses to the Inspections	*The City currently records system inspections in a database developed in-house. The City's goal is to implement a more comprehensive (GIS-based) database management system for the storm sewer system that is linked with the system map. This BMP is intended to start with the GIS data and create a database that can be expanded to include information on a range of BMPs (rainwater gardens, storm-ceptors, ponds, sump manholes, infiltration areas, etc.) located in and operated by the City. The database will help the City in tracking the condition of system components, scheduling and tracking inspections under related BMPs in the City's MS4 permit, and in completion of the annual reporting requirements. Ultimately, the database will allow more efficient use of City resources to comply with NPDES program requirements and therein protecting and improving water resources in the City.* *The City will continue to track the inspection program data in the current system. A GIS-based database system to accommodate all City storm system infrastructures will be developed. The database will be maintained and updated with system inspection records.* *This BMP will be evaluated for continuance. The development of a GIS based system for tracking operation and maintenance in the City of Long Lake may be impractical given the few numbers of BMPs that are currently functioning within the City.*
Evaluation of Inspection Frequency	*The City currently operates a program of cleaning structural BMPs including catch basins, storm water ponds and system outfalls. City staff inspects system components to look for sediment and debris buildup and proper functioning of the system and illicit discharges. The inspection program will be coordinated with the BMP and Outfall mapping updates.* *As the City develops a more functional system database to better track system maintenance activities and findings, the*

	system will assist in evaluating the frequency of maintenance for components of the City's system. As the system is populated with data, the City will be better able to evaluate the need for more or less frequent maintenance of BMPs, storm system and material storage and handling areas. *The City will reevaluate the inspection schedule and frequencies following annual reporting results. If prior year conditions warranted more or less frequent cleaning or maintenance a change in frequency will be made.* *This BMP will be implemented into the new permit term.*

BMP categories to be implemented	**Measurable goals and timeframes**
Spill Prevention & Control Plans for Municipal Facilities	*Ensure that plans describing spill prevention and control procedures are consistent among all departments. Conduct annual spill prevention and response training sessions to all municipal employees. Distribute education materials to each municipal facility by the end of year 2.*
Facility Inventory	*Update facilities inventory to identify potential pollutants at each site. Create a map of all identified facilities and BMPs implemented to prevent detrimental impacts to water quality.*
Pond Assessment Procedures & Schedule	*In year 1, develop procedures for determining TSS and TP treatment effectiveness of city owned ponds used for treatment of stormwater. Implement schedule in years 2-5.*

5. Does discharge from your MS4 affect a Source Water Protection Area (Permit Part III.D.6.c.)? ☒ Yes ☐ No

   a. If **no**, continue to 6.

   b. If **yes**, the Minnesota Department of Health (MDH) is in the process of mapping the following items. Maps are available at http://www.health.state.mn.us/divs/eh/water/swp/maps/index.htm. Is a map including the following items available for your MS4:

      1) Wells and source waters for drinking water supply management areas identified as vulnerable under Minn. R. 4720.5205, 4720.5210, and 4720.5330? ☒ Yes ☐ No

      2) Source water protection areas for surface intakes identified in the source water assessments conducted by or for the Minnesota Department of Health under the federal Safe Drinking Water Act, U.S.C. §§ 300j – 13? ☐ Yes ☒ No

   c. Have you developed and implemented BMPs to protect any of the above drinking water sources? ☐ Yes ☒ No

6. Have you developed procedures and a schedule for the purpose of determining the TSS and TP treatment effectiveness of all permittee owned/operated ponds constructed and used for the collection and treatment of stormwater, according to the Permit (Part III.D.6.d.)? ☐ Yes ☒ No

7. Do you have inspection procedures that meet the requirements of the Permit (Part III.D.6.e.(1)-(3)) for structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material handling areas? ☒ Yes ☐ No

8. Have you developed and implemented a stormwater management training program commensurate with each employee's job duties that:

   a. Addresses the importance of protecting water quality? ☐ Yes ☒ No

   b. Covers the requirements of the permit relevant to the duties of the employee? ☐ Yes ☒ No

   c. Includes a schedule that establishes initial training for new and/or seasonal employees and recurring training intervals for existing employees to address changes in procedures, practices, techniques, or requirements? ☐ Yes ☒ No

9. Do you keep documentation of inspections, maintenance, and training as required by the Permit (Part III.D.6.h.(1)-(5))? ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements listed in **Questions 5 – 9**, then describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

F.5.c. As part of the regulatory mechanism updates for (II.B.3.a.1) the City will provide a BMP to protect drinking water

sources that the MS4 discharges may affect as described in the Permit (Part III.D.6.c). The amended ordinance will be placed on the City Council's meeting agenda for approval within 12 months following the date permit coverage is extended.

F.6. The City will develop a procedure for assessing ponds to determine TSS and TP effectiveness as described in the Permit (Part III.D.6.d). This study will develop procedures for determining TSS and TP treatment effectiveness of city-owned ponds used for treatment of stormwater. A schedule will be implemented in years 2 thru 5.

F.7., The City will develop written procedures for inspection of structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material handling areas as described in the Permit (Part III.D.6.f.). Procedures will be in place within 12 months following the date permit coverage is extended.

F.8., The City will develop and implement a stormwater management training program commensurate with each employees job duties as described in the Permit (Part III.D.6.g.). Procedures will be in place within 12 months following the date permit coverage is extended.

F.9., The City will develop written procedures to document inspections, mainenance, and training as described in the Permit (Part III.D.6.h.). Procedures will be in place within 12 months following the date permit coverage is extended.

10. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

    Marv Wurzer, Public Works Director

VI. Compliance Schedule for an Approved Total Maximum Daily Load (TMDL) with an Applicable Waste Load Allocation (WLA) (Part II.D.6.)

A. Do you have an approved TMDL with a Waste Load Allocation (WLA) prior to the effective date of the Permit? ☐ Yes ☒ No

1. If **no**, continue to section VII.
2. If **yes**, fill out and attach the MS4 Permit TMDL Attachment Spreadsheet with the following naming convention**:** *MS4NameHere_TMDL.*

   This form is found on the MPCA MS4 website: http://www.pca.state.mn.us/ms4.

VII. Alum or Ferric Chloride Phosphorus Treatment Systems (Part II.D.7.)

A. Do you own and/or operate any Alum or Ferric Chloride Phosphorus Treatment Systems which are regulated by this Permit (Part III.F.)? ☐ Yes ☒ No

1. If **no**, this section requires no further information.
2. If **yes**, you own and/or operate an Alum or Ferric Chloride Phosphorus Treatment System within your small MS4, then you must submit the Alum or Ferric Chloride Phosphorus Treatment Systems Form supplement to this document, with the following naming convention: *MS4NameHere_TreatmentSystem*.
   This form is found on the MPCA MS4 website: http://www.pca.state.mn.us/ms4.

VIII. Add any Additional Comments to Describe Your Program